

# **Exhibit A**

LENOX, SOCEY, FORMIDONI, GIORDANO, COOLEY, LANG & CASEY

A LIMITED LIABILITY COMPANY

COUNSELLORS AT LAW

3131 PRINCETON PIKE - 1B, SUITE 104

LAWRENCEVILLE, NEW JERSEY 08648

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\*MEMBER OF N.J. AND PA. BAR

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\*\*\*MEMBER OF N.J. & N.Y. BAR

†CERTIFIED AS A CIVIL TRIAL ATTORNEY

SAMUEL D. LENOX  
1922-1975

January 17, 2014

Michael F. Barrett, Esq.  
Mary T. Gidaro, Esq.  
Saltz, Mongeluzzi, Barrett & Bendesky, P.C.  
8000 Sagemore Drive, Suite 8303  
Marlton, NJ 08053

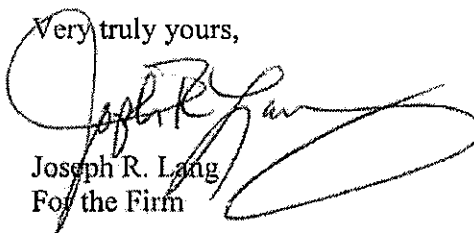
Re: Rivera v Bhagat  
MDL No. 1:13-md-2419-FDS

Dear Counsel:

I am in receipt of plaintiff's request for Dr. Bhagat to provide answers to supplemental interrogatories in the above referenced matter. Kindly be advised that Dr. Bhagat will not be answering any discovery requests in this case. Since you saw fit not to name him as a defendant in the Short Form Complaint, Dr. Bhagat has no obligation to provide any discovery responses made by your firm.

Please be guided accordingly.

Very truly yours,

  
Joseph R. Lang  
For the Firm

JRL:klm

cc: Stephen A. Grossman, Esq.

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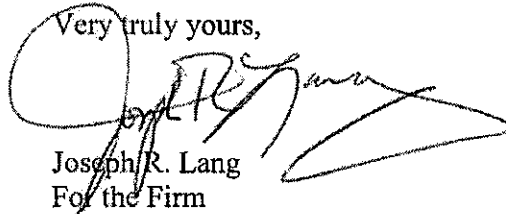
Re: Ramos v Bhagat  
MDL No. 1:13-md-2419-FDS

Dear Counsel:

I am in receipt of plaintiff's request for Dr. Bhagat to provide answers to supplemental interrogatories in the above referenced matter. Kindly be advised that Dr. Bhagat will not be answering any discovery requests in this case. Since you saw fit not to name him as a defendant in the Short Form Complaint, Dr. Bhagat has no obligation to provide any discovery responses made by your firm.

Please be guided accordingly.

Very truly yours,

A handwritten signature in black ink, appearing to read 'J. R. Lang', is written over a circular stamp. The signature is fluid and cursive.

Joseph R. Lang  
For the Firm

JRL:klm

cc: Stephen A. Grossman, Esq.